

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**PPG INDUSTRIES, INC., a Pennsylvania
corporation,**

Plaintiff,

v.

**JIANGSU TIE MAO GLASS CO., LTD., a
Chinese company; BENHUA WU, an
individual; and MEI ZHANG, an
individual.**

Defendants.

Case No.: 2-15-cv-00965-MRH

**PLAINTIFF’S MOTION FOR DEFAULT JUDGMENT AND PERMANENT
INJUNCTION AGAINST ALL DEFENDANTS**

Plaintiff PPG Industries, Inc. (“PPG”), by and through its undersigned counsel and pursuant to Federal Rules of Civil Procedure 55(b) and 65(d), moves this Court for entry of default judgment and permanent injunction in PPG’s favor and against all Defendants, jointly and severally, as follows:

- A. Adjudicating that Defendants Tie Mao Glass, Benhua Wu, and Mei Zhang, jointly and severally, violated the Pennsylvania Uniform Trade Secrets Act, 12 Pa. Cons. Stat. Ann. §§ 5301 *et seq.*, by willfully and maliciously misappropriating PPG’s trade secrets;
- B. Permanently enjoining Defendants from ongoing violations of the Pennsylvania Uniform Trade Secrets Act, directly or indirectly, by permanently prohibiting

Defendants¹ from conducting any business or financial transaction within the United States, with United States currency, or in any manner or circumstance that may affect United States interstate commerce that involves Defendants using, disclosing, and/or referencing in any way, any of PPG's trade secrets improperly transmitted by Thomas Rukavina or any other current or former PPG employee or consultant to Defendants;

- C. Ordering Defendants to immediately return any all documents, records, communications, notes, recordings, and data of any kind within their possession, custody, or control that directly or indirectly reference PPG's trade secrets in any way, whether in hard-copy or electronic form or otherwise, and including any copies thereof, as well as provide PPG with a list of all other entities (including all names, addresses and contact information associated with such entities) and persons to which PPG's trade secrets may have been transferred or disclosed;
- D. Pursuant to 12 Pa. Cons. Stat. Ann. § 5304(a), entering a judgment in PPG's favor and against Defendants Jiangsu Tie Mao Glass Co., Ltd., Benhua Wu, and Mei Zhang, jointly and severally, in the amount of \$29,729,061.93 for damages, including exemplary damages pursuant to 12 Pa. Cons. Stat. Ann. § 5304(b), caused by their willful and malicious misappropriation of PPG's trade secrets in violation of the Pennsylvania Uniform Trade Secrets Act, 12 Pa. Const. Stat. Ann. §§ 5301 *et seq.*; and

¹ This includes any parent, subsidiary, division, branch, affiliate, predecessor or successor in business, and/or wholly owned or partially owned entity acting or purporting to act for or on their behalf, or who are subject to their direction or control including, without limitation, any agent, employee, officer, director, attorney, investigator, and/or consultant of Defendants.

E. Awarding PPG its reasonable attorneys' fees, expenses, and costs pursuant to 12 Pa. Cons. Stat. Ann. § 5305, in the amount of \$1,737,288.28 as of April 30, 2019.

In support of its motion, PPG incorporates and relies on the reasons set forth in *Plaintiff's Memorandum In Support Of Motion For Default Judgment And Permanent Injunction Against All Defendants* and accompanying declarations filed concurrently therewith.

Dated: May 24, 2019

Respectfully submitted,

By: /s/ Alexander J. Merton

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